

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley, <i>Co-Chair</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Paul J. Hanly, Jr., <i>Co-Liaison Counsel</i> HANLY CONROY BIERSTEIN SHERIDAN FISHER & HAYES LLP	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF AND FACSIMILE

September 15, 2015

The Honorable Frank Maas
 United States District Court
 Southern District of New York
 Daniel Patrick Moynihan U.S. Courthouse
 500 Pearl Street, Room 740
 New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (FM)*

Dear Judge Maas:

I write on behalf of the Plaintiffs' Executive Committees to respectfully request a two-week extension of the current September 15, 2015 deadline for plaintiffs and all defendants engaged in merits discovery to submit their amended Initial Disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1), to September 30, 2015.

Plaintiffs have conferred with the Defendants' Executive Committee ("DEC") on this matter, and the DEC consents to the proposed extension. The parties are in further agreement that the exchange of their amended Initial Disclosures on September 30 should be made in good faith to reflect comprehensive witness lists, but that plaintiffs and defendants in merits discovery shall be permitted to amend their witness lists freely before the end of 2015 and should be allowed to amend their witness lists thereafter in the event of the death or unavailability of a witness, to reflect or incorporate newly discovered information or facts, or for other good cause.

The parties thank Your Honor for the Court's attention to this matter.

The Honorable Frank Maas

September 15, 2015

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Respectfully submitted,



J. Scott Tarbutton, Esq.

THE MDL 1570 PLAINTIFFS' EXECUTIVE
COMMITTEES

JST

cc: MDL-1570 Counsel of Record (via ECF)

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